Robert L. Sills (RS 8896)
Jay K. Musoff (JM 8716)
Orrick, Herrington & Sutcliffe LLP
666 Fifth Avenue
New York, New York 10103
Telephone: (212) 506-5000
Facsimile: (212) 506-5151
Attorneys for Petitioner

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TELENOR MOBILE COMMUNICATIONS AS,

Petitioner,

-against-

07 Civ. 6929 (GEL)

STORM LLC,

ECF Case

Respondent,

-and-

STIPULATION AND ORDER

ALTIMO HOLDINGS & INVESTMENTS LIMITED, ALPREN LIMITED, AND HARDLAKE LIMITED,

Additional Contemnors.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys of record for the undersigned herein, as follows:

1. The hearing of the motion of Petitioner Telenor Mobile Communications AS

("Telenor Mobile") for an order of contempt (the "Contempt Motion") now scheduled for

Thursday, February 7, 2008, at 2:00 p.m., is adjourned to Wednesday, March 12, at 10:00 a.m.,

or to such other date and time during the week of March 10 as is convenient to the Court.

- The requests for discovery previously propounded in connection with the 2. Contempt Motion shall be responded to as follows:
- Copies of all responsive non-privileged documents, not otherwise objected A. to, and all objections thereto, shall be served on the attorneys for Telenor Mobile on or before the close of business on Wednesday, February 6, 2008;
- B. The depositions of Storm LLC ("Storm") by Vadim Klymenko, and of Altimo Holdings and Investments Limited ("Altimo"), Hardlake Limited ("Hardlake") and Alpren Limited ("Alpren") pursuant to Fed. R. Civ. P. 30(b)(6), shall be taken in New York, New York during the week of February 11, 2008, on mutually agreed dates; provided, however, that if any witness to be produced cannot obtain a visa for travel to the United States after making a timely and good faith effort to obtain one, he or she will be produced in London or Paris, or some other mutually agreed-on location outside Ukraine or Russia;
- C. Telenor Mobile agrees and acknowledges that it will not serve or attempt to serve process on any witness produced pursuant to paragraph 2 above, either individually or as representatives of Storm, Altimo, Hardlake or Alpren, as the case may be, while such witness is traveling to, in attendance at, or traveling from, his or her deposition in accordance with Section 2B;
- By responding to discovery as set forth above, neither Altimo, Alpren nor D. Hardlake admits or acknowledges that it is a party herein.
- 3. Papers in opposition to the Contempt Motion shall be served on the attorneys for Telenor Mobile by Storm, Altimo, Hardlake and Alpren on or before the close of business on Monday, February 25, 2008.

Reply papers in further support of the Contempt Motion shall be served on or 4. before the close of business on Wednesday, March 5, 2008.

Dated: New York, New York February 4, 2007

ORRICK, HERRINGTON & SUTCLIFFE LLP

Robert L. Sills (RS 8896)

666 Fifth Avenue

New York, New York 10103 Telephone: (212) 506-5000 Facsimile: (212) 506-5151

Attorneys for Petitioner Telenor Mobile Communications AS

CRAVATH, SWAINE & MOORE LLP

Ronald S. Rolfe (RR 0846)

Worldwide Plaza 825 Eighth Avenue

New York, NY 10019-7475

Telephone: (212) 474-1000

Facsimile: (212) 474-3700

Attorneys for Additional Contemnors Altimo Holdings & Investments Limited, Alpren Limited and Hardlake Limited

LOVELLS LLP

Pieter Van Tol (PT 2445) 590 Madison Avenue

New York, New York 10022

Telephone: (212) 909-0600

Facsimile: (212) 909-0660

Attorneys for Respondent Storm LLC

SO ORDERED: